

Sylvia said if decisions are different from human health risk, may not get full \$ request (\$17.0 million). Also, for priority panel, will need to explain diff. between initial PP + now.



I reviewed the Project Description provided to the Priority Panel in 2003, as well as recent AA briefings by Region 8, e-mails and my site file to provide the following observations:

#### Site Response History:

1999 – Removal action starts.

2000-2002 Cleanup of mine road and disposal operations, screening plant, Raintree nursery, export plant, ball fields, schools (4), school tracks, highly contaminated residences, asbestos landfill cell construction.

2003-present Priority shifts to Residential/Commercial removals  
Removal of most large sources completed.  
Assessment of 4000 residences.

2003	157 properties completed
2004	170 properties completed
2005	225 properties completed
2006	41 properties completed (as of 5/16/06)

2005 average cost per property = \$30K

Funding to date \$174M through FY'2006 to address contamination in Libby and an additional \$12M for ATSDR health evaluation activities.

2003 Funding plan – I note the following differences from the 4/30/2003 document.

- 1200 cleanups (400 interior, 400 exterior, 200 both, 200 unknown) (1400+) could possibly be 1600 + properties
- Cleanup rate is 300/year, completion 2007. (200/year through 2012)
- Town of Troy - State will respond at Troy as part of its 10% cost share. Can't do until ROD signed, expect Troy investigation to begin 2008)

Received an e-mail in FY'05 and a power point briefing in FY'06 that some additional high-priority areas may require clean-up (Annotated with dates planned/completed from briefing):

- Stimson Maintenance building (2005 est. \$800K+)
- Helipad at Hospital covered with vermiculite (2005)
- Compost area at Landfill
- Wise property between flyway and screening plant. Grace doesn't own.
- State highway #37 right-of-way along Flyway – Grace doesn't own (?)
- J. Neil Public Park (2005)
- Building demolitions (2005 and on)
- Clean-up of Stimson Mill - Nursery area, used vermiculite and soil surfaces are visibly contaminated, to be redeveloped (2006?)
- Libby Public Golf Course (2006?).

**Change in project duration - From Bert Garcia 11/05/05 e-mail**

EPA has budgeted \$17 million annually for the cleanup of asbestos-contaminated properties in the Town of Libby. Conditions differ from those on which the original schedule and budget were estimate. The original estimate of 1230 properties needing cleanup in Libby will increase by about 200. The projected rate of 300 cleanups each year is actually at about 200. The Region is preparing a revised schedule and budget projection.

*The initial projections for funding and completion of work based on \$17 million annually were for completion of work by 2009. Based on the increase in the number of properties in Libby needing cleanup and the actual annual rate of cleanup, the Region is preparing a revised schedule and budget projection.*

No funds have been budgeted for the cleanup of approximately 300 properties in the nearby town of Troy, nor the mine that was the source of contaminants, nor other separate properties also contaminated.

The following was excerpted from e-mail between Larry Zaragoza, Betsy Southerland and Bert Garcia about 11/08/05 requesting information about long-term funding plans. John, this is what we were talking about previously when I told you that at some point we asked the Regions for an OSWER information request about long-term funding needs. I don not know the specific request, but I know this is the response worked out between Bert and Larry.

FY	RA Funding (\$K)	Comment
2006	\$17,000	The original estimate of 1230 properties needing cleanup in Libby will increase by about 200. The initial projected rate of 300 cleanups each year is actually slightly more than 200. As of 10/31/05, a total of 566 residential properties have been cleaned up in Libby. 213 were completed in 2005. Cost per property has steadily declined. Many public areas, including schools, recreational areas, roads and commercial properties were cleaned. A new disposal cell at the local landfill was constructed. A Record of Decision specifying final cleanup areas, number of residential properties and public areas to be cleaned is scheduled for 5/1/2006.
2007	\$17,000	Continuation of cleanup operations
2008	\$17,000	Continuation of cleanup operations.
2009	\$17,000	Continuation of cleanup operations.
2010	\$15,000	Continuation of cleanup operations
2011	\$15,000	Continuation of cleanup operations.
2012	\$15,000	Continuation of cleanup operations.